

**EXHIBIT 9**

**DECLARATION OF PLAINTIFF  
FELIPE DE JESUS SUAREZ-PALAFIX**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA

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)  
FELIPE DE JESUS AVILA-SOTO, et al. )  
Plaintiffs, ) Case No. 6:24-cv-01392  
)  
v. ) JUDGE ROBERT R. SUMMERHAYS  
)  
) MAGISTRATE JUDGE CAROL B.  
SOUTH CENTRAL SUGAR CANE )  
GROWERS' ASSOCIATION, INC., et al. )  
Defendants. )  
)  
Whitehurst

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**DECLARATION OF FELIPE DE JESUS SUAREZ-PALAFOX**

1. My name is Felipe de Jesus Suarez-Palafox. I am one of the Plaintiffs in this case.
2. My permanent residence is in Mexico. I have worked for the Defendants with an H-2A temporary work visa as a truck driver during each sugarcane harvest season between 2022 and 2025. I also worked in prior years as an H-2A truck driver for a prior company that was also associated with the Sterling Sugars' mill.
3. During each of the sugarcane harvest seasons between 2022 and 2025 I work for the Defendants as a truck driver operating a tractor-trailer truck to haul sugarcane from fields to the Sterling Sugars mill. I have not had any other job responsibilities with the Defendants other than to perform work as a truck driver between 2022 and 2025.
4. Between 2022 and 2025 there were many of us from Mexico with H-2A visas who do the same job as me—driving trucks to haul sugarcane to the mill. Myself and many of the other truck drivers from Mexico stay in an old motel near the mill and pick up our trucks each day at the truck yard.

5. Between 2022 and 2025 I worked more than 40 hours during most of the weeks that I worked for the Defendants as a truck driver. I have never received any overtime pay when I worked more than 40 hours in a week, including during the current 2025 season. Attached to this declaration are copies of some of the paycheck stubs that I received that show I did not receive overtime pay when I worked more than 40 hours in a week, including one from the current 2025 season.

6. My co-workers who came from Mexico with H-2A visas and also worked as truck drivers between 2022 and 2025 also did not receive overtime pay. I know this because we lived together and would sometimes talk about how we were paid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on \_\_\_\_\_

\_\_\_\_\_  
Felipe de Jesus Suarez-Palafox

Employee Name: FELIPE D SUAREZ PALAFOX			SSN #: 3046		Check #: 3046				
Pay period : 10/01/25 to : 10/14/25		Earnings		Taxes		Deductions & Other Pays			
Type	Hours	Dollars	Type	Dollars					
Gross	2102.15		Reg	141.75	2102.15	FWT	61.75	MEALS	-196.00
Other	0.00		OT1	0.00	0.00	OASDI	0.00	AR EMP	-100.00
Tips	0.00		OT2	0.00	0.00	MED	0.00		
Cash Tips	0.00		Vac	0.00	0.00	SWT	35.25		
Subtotal	2102.15		Sick	0.00	0.00	SDI	0.00		
Dir Dep	-1709.15		Hol	0.00	0.00	SUI	0.00		
Taxes	-97.00		Comm	0.00	0.00				
Deducts	-296.00		Misc	0.00	0.00				
<b>Net Pay</b>	<b>0.00</b>		Other	0.00	0.00				
			<b>Gross Pay</b>	<b>2102.15</b>		<b>Total Tax</b>	<b>97.00</b>		
Year-to-Date:	Gross	5016.06	Vacation:	Earned	0.00	Direct			3046
FWT	116.18	SWT		Taken	0.00	Deposit			1709.15
OASDI	0.00	SDI							
MED	0.00	SUI							

\*\*\*\*\* Zero & 00/100 Dollars

10/20/2025

\*\*\*\*\*0.00

FELIPE D SUAREZ PALAFOX

[REDACTED]

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

Employee ID: 5076

CHECK NUMBER

SSN #:  
Check #: 2395

Pay period : 12/28/22 to : 01/10/23		Employee Name: FELIPE D SUAREZ PALAFOX				
Type	Earnings Hours	Dollars	Type	Taxes Dollars	Deductions & Other Pays	
Gross	2278.41	Reg 171.00	2278.41	FWT 98.37		
Other	0.00	OT1 0.00		OASDI 0.00		
Tips	0.00	OT2 0.00		MED 0.00		
Cash Tips	0.00	Vac 0.00		SWT 55.34		
		Sick 0.00		SDI 0.00		
Subtotal	2278.41	Hol 0.00		SUI 0.00		
Taxes	-153.71	Comm				
Deducts	-196.00	Misc				
Net Pay	1928.70	Other				
		Gross Pay 2278.41	Total Tax 153.71			

Year-to-Date: Gross 4310.87 FWT 168.92 MED 0.00 Federal Tax ID: [REDACTED]  
Pay Rate: 13.670 OASDI 0.00 SWT 102.07

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

SSN #:  
Check #: 2227

Pay period : 12/14/22 to : 12/27/22		Employee Name: FELIPE D SUAREZ PALAFOX				
Type	Earnings Hours	Dollars	Type	Taxes Dollars	Deductions & Other Pays	
Gross	2032.46	Reg 163.25	2032.46	FWT 70.55		
Other	0.00	OT1 0.00		OASDI 0.00		
Tips	0.00	OT2 0.00		MED 0.00		
Cash Tips	0.00	Vac 0.00		SWT 46.73		
		Sick 0.00		SDI 0.00		
Subtotal	2032.46	Hol 0.00		SUI 0.00		
Taxes	-117.28	Comm				
Deducts	-196.00	Misc				
Net Pay	1719.18	Other				
		Gross Pay 2032.46	Total Tax 117.28			

Year-to-Date: Gross 2032.46 FWT 70.55 MED 0.00 Federal Tax ID: [REDACTED]  
Pay Rate: 12.450 OASDI 0.00 SWT 46.73

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

SSN #:  
Check #: 1692

Pay period : 11/02/22 to : 11/15/22		Employee Name: FELIPE D SUAREZ PALAFOX				
Type	Earnings Hours	Dollars	Type	Taxes Dollars	Deductions & Other Pays	
Gross	2144.51	Reg 172.25	2144.51	FWT 82.30		
Other	0.00	OT1 0.00		OASDI 0.00		
Tips	0.00	OT2 0.00		MED 0.00		
Cash Tips	0.00	Vac 0.00		SWT 50.65		
		Sick 0.00		SDI 0.00		
Subtotal	2144.51	Hol 0.00		SUI 0.00		
Taxes	-132.95	Comm				
Deducts	-196.00	Misc				
Net Pay	1815.56	Other				
		Gross Pay 2144.51	Total Tax 132.95			

Year-to-Date: Gross 6919.09 FWT 263.72 MED 0.00 Federal Tax ID: [REDACTED]  
Pay Rate: 12.450 OASDI 0.00 SWT 156.86

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #: Check #: 3032

Pay period : 11/30/22 to : 12/13/22		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	1799.03	Reg	144.50	1799.03	FWT	47.21	MEALS	-196.00
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	38.56		
		Sick	0.00		SDI	0.00		
Subtotal	1799.03	Hol	0.00		SUI	0.00		
Taxes	-85.77	Comm						
Deducts	-196.00	Misc						
Net Pay	1517.26	Other						
		Gross Pay		1799.03	Total Tax	85.77		

Year-to-Date: Gross 10719.46 FWT 378.37 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate: 12.450 OASDI 0.00 SWT 241.06

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

CHECK NUMBER

SSN #: Check #: 1512

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 10/19/22 to : 11/01/22		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	2175.64	Reg	174.75	2175.64	FWT	86.04	MEALS	-196.00
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	51.74		
		Sick	0.00		SDI	0.00		
Subtotal	2175.64	Hol	0.00		SUI	0.00		
Taxes	-137.78	Comm						
Deducts	-196.00	Misc						
Net Pay	1841.86	Other						
		Gross Pay		2175.64	Total Tax	137.78		

Year-to-Date: Gross 4774.58 FWT 181.42 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate: 12.450 OASDI 0.00 SWT 106.21

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

CHECK NUMBER

SSN #: Check #: 1219

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 10/05/22 to : 10/18/22		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	2253.45	Reg	181.00	2253.45	FWT	95.38	MEALS	-196.00
Other	0.00	OT1	0.00		OASDI	0.00	STORES	-100.00
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	54.47		
		Sick	0.00		SDI	0.00		
Subtotal	2253.45	Hol	0.00		SUI	0.00		
Taxes	-149.85	Comm						
Deducts	-296.00	Misc						
Net Pay	1807.60	Other						
		Gross Pay		2253.45	Total Tax	149.85		

Year-to-Date: Gross 2598.94 FWT 95.38 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate: 12.450 OASDI 0.00 SWT 54.47

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

**SOUTH CENTRAL SUGAR CANE GROWERS ASSOC**

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 592

Pay period : 11/01/23 to : 11/14/23		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	3282.93	Reg	141.75	3282.93	FWT	209.49	MEALS	-196.00
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	90.50		
		Sick	0.00		SDI	0.00		
Subtotal	3282.93	Hol	0.00		SUI	0.00		
Dir Dep	-2786.94							
Taxes	-299.99							
Deducts	-196.00							
<b>Net Pay</b>	<b>0.00</b>	<b>Gross Pay</b>		<b>3282.93</b>	<b>Total Tax</b>	<b>299.99</b>		
<b>Year-to-Date:</b>	<b>Gross</b>	<b>17093.63</b>	<b>Vacation:</b>	<b>Earned</b>	<b>0.00</b>	<b>Direct</b>		2798.24
FWT	641.23	SWT		Taken	0.00	Deposit		

**SOUTH CENTRAL SUGAR CANE GROWERS ASSOC**

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 23

Pay period : 10/04/23 to : 10/17/23		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	1855.70	Reg	135.75	1855.70	FWT	45.95	MEALS	-168.00
Other	0.00	OT1	0.00		OASDI	0.00	STORES	-100.00
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	40.55		
		Sick	0.00		SDI	0.00		
Subtotal	1855.70	Hol	0.00		SUI	0.00		
Dir Dep	-1501.20							
Taxes	-86.50							
Deducts	-268.00							
<b>Net Pay</b>	<b>0.00</b>	<b>Gross Pay</b>		<b>1855.70</b>	<b>Total Tax</b>	<b>86.50</b>		
<b>Year-to-Date:</b>	<b>Gross</b>	<b>8058.34</b>	<b>Vacation:</b>	<b>Earned</b>	<b>0.00</b>	<b>Direct</b>		1501.20
				Taken	0.00	Deposit		

**SOUTH CENTRAL SUGAR CANE GROWERS ASSOC**

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 749

Pay period : 11/15/23 to : 11/28/23		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	3537.69	Reg	152.75	3537.69	FWT	240.06	MEALS	-196.00
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	99.42		
		Sick	0.00		SDI	0.00		
Subtotal	3537.69	Hol	0.00		SUI	0.00		
Dir Dep	-3002.21							
Taxes	-339.48							
Deducts	-196.00							
<b>Net Pay</b>	<b>0.00</b>	<b>Gross Pay</b>		<b>3537.69</b>	<b>Total Tax</b>	<b>339.48</b>		
<b>Year-to-Date:</b>	<b>Gross</b>	<b>20631.32</b>	<b>Vacation:</b>	<b>Earned</b>	<b>0.00</b>	<b>Direct</b>		3002.21
FWT	981.20	SWT		Taken	0.00	Deposit		

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC  
Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #: Check #: 313

Pay period : 10/18/23 to : 10/31/23		Earnings			Taxes		Deductions & Other Pays
Type	Hours	Dollars	Type	Hours	Dollars		
Gross	2912.37	Reg	125.75	2912.37	FWT	165.02	MEALS
Other	0.00	OT1	0.00		OASDI	0.00	-196.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	77.53	
		Sick	0.00		SDI	0.00	
Subtotal	2912.37	Hol	0.00		SUI	0.00	
Dir Dep	-2473.82	Comm					
Taxes	-242.55	Misc					
Deducts	-196.00	Other					
<b>Net Pay</b>	<b>0.00</b>	<b>Gross Pay</b>	<b>2912.37</b>	<b>Total Tax</b>	<b>242.55</b>		

Year-to-Date: Gross 13393.82 Vacation: Earned 0.00 Direct Deposit [REDACTED] 2473.82  
 FWT 131.74 SWT 293.10 Taken 0.00

## SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #: Check #: 2583

Pay period : 01/11/23 to : 01/24/23		Earnings			Taxes		Deductions & Other Pays
Type	Hours	Dollars	Type	Hours	Dollars		
Gross	1845.45	Reg	135.00	1845.45	FWT	51.85	MEALS
Other	0.00	OT1	0.00		OASDI	0.00	-154.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	40.19	
		Sick	0.00		SDI	0.00	
Subtotal	1845.45	Hol	0.00		SUI	0.00	
Taxes	-92.04	Comm					
Deducts	-154.00	Misc					
<b>Net Pay</b>	<b>1599.41</b>	<b>Gross Pay</b>	<b>1845.45</b>	<b>Total Tax</b>	<b>92.04</b>		

Year-to-Date: Gross 6156.32 FWT 220.77 MED 0.00 Federal Tax ID: [REDACTED]  
 Pay Rate: 13.670 OASDI 0.00 SWT 142.26

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

## SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #: Check #: 1088

Pay period : 12/13/23 to : 12/26/23		Earnings			Taxes		Deductions & Other Pays
Type	Hours	Dollars	Type	Hours	Dollars		
Gross	3740.34	Reg	161.50	3740.34	FWT	264.38	MEALS
Other	0.00	OT1	0.00		OASDI	0.00	-196.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	106.51	
		Sick	0.00		SDI	0.00	
Subtotal	3740.34	Hol	0.00		SUI	0.00	
Dir Dep	-3173.45	Comm					
Taxes	-370.89	Misc					
Deducts	-196.00	Other					
<b>Net Pay</b>	<b>0.00</b>	<b>Gross Pay</b>	<b>3740.34</b>	<b>Total Tax</b>	<b>370.89</b>		

Year-to-Date: Gross 28413.08 Vacation: Earned 0.00 Direct Deposit [REDACTED] 3173.45  
 FWT 1446.18 SWT 708.04 Taken 0.00  
 OASDI 0.00 SDI 0.00

## SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #: Check #: 916

Pay period : 11/29/23 to : 12/12/23		Earnings			Taxes		Deductions & Other Pays
Type	Hours	Dollars	Type	Hours	Dollars		
Gross	4041.42	Reg	174.50	4041.42	FWT	300.51	MEALS
Other	0.00	OT1	0.00		OASDI	0.00	-196.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	118.51	
		Sick	0.00		SDI	0.00	
Subtotal	4041.42	Hol	0.00		SUI	0.00	
Dir Dep	-3426.40	Comm					
Taxes	-419.02	Misc					
Deducts	-196.00	Other					
<b>Net Pay</b>	<b>0.00</b>	<b>Gross Pay</b>	<b>4041.42</b>	<b>Total Tax</b>	<b>419.02</b>		

Year-to-Date: Gross 24672.74 Vacation: Earned 0.00 Direct Deposit [REDACTED]

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CHECK NUMBER

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

SSN #: Check #: 1872

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 11/16/22 to : 11/29/22		Type	Earnings Hours	Dollars	Type	Taxes Dollars	Deductions & Other Pays
Gross	2001.34	Reg	160.75	2001.34	FWT	67.44	
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	45.64	
		Sick	0.00		SDI	0.00	
Subtotal	2001.34	Hol	0.00		SUI	0.00	
Taxes	-113.08	Comm			Total Tax	113.08	
Deducts	-196.00	Misc					
Net Pay	1692.26	Other					
		Gross Pay		2001.34			

Year-to-Date: Gross 8920.43 FWT 331.16 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate: 12.450 OASDI 0.00 SWT 202.50

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SSN #: Check #: 2895

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 10/04/23 to : 10/17/23		Type	Earnings Hours	Dollars	Type	Taxes Dollars	Deductions & Other Pays
Gross	1288.27	Reg	0.00	0.00	FWT	0.00	
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	20.69	
		Sick	0.00		SDI	0.00	
Subtotal	1288.27	Hol	0.00		SUI	0.00	
Dir Dep	-1267.58	Comm			Total Tax	20.69	
Taxes	-20.69	Misc					
Deducts	0.00	Other					
Net Pay	0.00	Gross Pay		1288.27			

Year-to-Date: Gross 9346.61 FWT 266.72 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate: 23.160 OASDI 0.00 SWT 203.50

CHECK NUMBER

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

SSN #: Check #: 2756

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 09/20/23 to : 10/03/23		Type	Earnings Hours	Dollars	Type	Taxes Dollars	Deductions & Other Pays
Gross	46.32	Reg	2.00	46.32	FWT	0.00	
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	0.00	
		Sick	0.00		SDI	0.00	
Subtotal	46.32	Hol	0.00		SUI	0.00	
Taxes	0.00	Comm			Total Tax	0.00	
Deducts	0.00	Misc					
Net Pay	46.32	Other					
		Gross Pay		46.32			

Year-to-Date: Gross 6202.64 FWT 220.77 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate: 23.160 OASDI 0.00 SWT 142.26

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

## SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #:

1576

Pay period : 10/02/24 to : 10/15/24		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	4612.51	Reg 192.75 4612.51	FWT 361.19	MEALS -196.00				
Other	0.00	OT1 0.00	OASDI 0.00					
Tips	0.00	OT2 0.00	MED 0.00					
Cash Tips	0.00	Vac 0.00	SWT 142.78					
Subtotal	4612.51	Sick 0.00	SDI 0.00					
Dir Dep	-3912.54	Hol 0.00	SUI 0.00					
Taxes	-503.97							
Deducts	-196.00							
Net Pay	0.00	Gross Pay 4612.51	Total Tax 503.97					

Year-to-Date: Gross 9631.28 Vacation: Earned 0.00 Direct Deposit 3912.54

FWT 587.53 SWT 269.63 Taken 0.00 OASDI 0.00 SDI 0.00

## SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #:

313

Pay period : 10/18/23 to : 10/31/23		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	2912.37	Reg 125.75 2912.37	FWT 165.02	MEALS -196.00				
Other	0.00	OT1 0.00	OASDI 0.00					
Tips	0.00	OT2 0.00	MED 0.00					
Cash Tips	0.00	Vac 0.00	SWT 77.53					
Subtotal	2912.37	Sick 0.00	SDI 0.00					
Dir Dep	-2473.82	Hol 0.00	SUI 0.00					
Taxes	-242.55							
Deducts	-196.00							
Net Pay	0.00	Gross Pay 2912.37	Total Tax 242.55					

Year-to-Date: Gross 13393.82 Vacation: Earned 0.00 Direct Deposit 2473.82

FWT 431.74 SWT 293.10 Taken 0.00 OASDI 0.00 SDI 0.00

## SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #:

916

Pay period : 11/29/23 to : 12/12/23		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	4041.42	Reg 174.50 4041.42	FWT 300.51	MEALS -196.00				
Other	0.00	OT1 0.00	OASDI 0.00					
Tips	0.00	OT2 0.00	MED 0.00					
Cash Tips	0.00	Vac 0.00	SWT 118.51					
Subtotal	4041.42	Sick 0.00	SDI 0.00					
Dir Dep	-3426.40	Hol 0.00	SUI 0.00					
Taxes	-419.02							
Deducts	-196.00							
Net Pay	0.00	Gross Pay 4041.42	Total Tax 419.02					

Year-to-Date: Gross 24672.74 Vacation: Earned 0.00 Direct Deposit 3426.40

FWT 1181.80 SWT 601.53 Taken 0.00 OASDI 0.00 SDI 0.00

## SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #:

23

Pay period : 10/04/23 to : 10/17/23		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	1855.70	Reg 135.75 1855.70	FWT 45.95	MEALS -168.00				
Other	0.00	OT1 0.00	OASDI 0.00	STORES -100.00				
Tips	0.00	OT2 0.00	MED 0.00					
Cash Tips	0.00	Vac 0.00	SWT 40.55					
Subtotal	1855.70	Sick 0.00	SDI 0.00					
Dir Dep	-1501.20	Hol 0.00	SUI 0.00					
Taxes	-86.50							
Deducts	-268.00							
Net Pay	0.00	Gross Pay 1855.70	Total Tax 86.50					

Year-to-Date: Gross 8058.34 Vacation: Earned 0.00 Direct Deposit 1501.20

## SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #:

749

Pay period : 11/15/23 to : 11/28/23		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				
Gross	3537.69	Reg 152.75 3537.69	FWT 240.06	MEALS -196.00				
Other	0.00	OT1 0.00	OASDI 0.00					
Tips	0.00	OT2 0.00	MED 0.00					
Cash Tips	0.00	Vac 0.00	SWT 99.42					
Subtotal	3537.69	Sick 0.00	SDI 0.00					
Dir Dep	-3002.21	Hol 0.00	SUI 0.00					
Taxes	-339.48							
Deducts	-196.00							
Net Pay	0.00	Gross Pay 3537.69	Total Tax 339.48					

Year-to-Date: Gross 20631.32 Vacation: Earned 0.00 Direct Deposit 3002.21

FWT 884.30 SWT 492.00 Taken 0.00 OASDI 0.00 SDI 0.00

CHECK NUMBER

## SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #:

2583

Pay period : 01/11/23 to : 01/24/23		Earnings			Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars				





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Pay period : 12/28/22 to : 01/10/23		Type	Earnings Hours	Dollars	Taxes	Type	Dollars	Deductions & Other Pays
Gross	2278.41	Reg	171.00	2278.41	FWT	98.37	MEALS	-196.00
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	55.34		
		Sick	0.00		SDI	0.00		
Subtotal	2278.41	Hol	0.00		SUI	0.00		
Taxes	-153.71	Comm						
Deducts	-196.00	Misc						
Net Pay	1928.70	Other						
		<b>Gross Pay</b>		<b>2278.41</b>	<b>Total Tax</b>	<b>153.71</b>		

Year-to-Date: Gross 4310.87 FWT 168.92 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate:

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 2756

Pay period : 09/20/23 to : 10/03/23		Type	Earnings Hours	Dollars	Taxes	Type	Dollars	Deductions & Other Pays
Gross	46.32	Reg	2.00	46.32	FWT	0.00		
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	0.00		
		Sick	0.00		SDI	0.00		
Subtotal	46.32	Hol	0.00		SUI	0.00		
Taxes	0.00	Comm						
Deducts	0.00	Misc						
Net Pay	46.32	Other						
		<b>Gross Pay</b>		<b>46.32</b>	<b>Total Tax</b>	<b>0.00</b>		

Year-to-Date: Gross 6202.64 FWT 220.77 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate:

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:  
Check #: 2895

Pay period : 10/04/23 to : 10/17/23		Type	Earnings Hours	Dollars	Taxes	Type	Dollars	Deductions & Other Pays
Gross	1288.27	Reg	0.00	0.00	FWT	0.00		
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	20.69		
		Sick	0.00		SDI	0.00		
Subtotal	1288.27	Hol	0.00		SUI	0.00		
Dir Dep	-1267.58	Comm						
Taxes	-20.69	Misc		1288.27				
Deducts	0.00	Other						
Net Pay	0.00	<b>Gross Pay</b>		<b>1288.27</b>	<b>Total Tax</b>	<b>20.69</b>		

Year-to-Date: Gross 9346.61 FWT 266.72 MED 0.00 Federal Tax ID: [REDACTED]

Pay Rate:

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:  
Check #: 452

Pay period : 11/03/23 to : 11/16/23		Type	Earnings Hours	Dollars	Taxes	Type	Dollars	Deductions & Other Pays
Gross	416.88	Reg	18.00	416.88	FWT	0.00		
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	0.00		
		Sick	0.00		SDI	0.00		
Subtotal	416.88	Hol	0.00		SUI	0.00		
Dir Dep	-416.88	Comm						
Taxes	0.00	Misc						
Deducts	0.00	Other						
Net Pay	0.00	<b>Gross Pay</b>		<b>416.88</b>	<b>Total Tax</b>	<b>0.00</b>		

Year-to-Date: Gross 13810.70 Vacation: Earned 0.00 Direct Deposit [REDACTED] 416.88

FWT 431.74 SWT 293.10

OASDI 0.00 SDI 0.00

MED 0.00 SUI 0.00

Pay period : 11/01/23 to : 11/14/23		Type	Earnings Hours	Dollars	Taxes	Type	Dollars	Deductions & Other Pays
Gross	3282.93	Reg	141.75	3282.93	FWT	209.49	MEALS	-196.00
Other	0.00	OT1	0.00		OASDI	0.00		
Tips	0.00	OT2	0.00		MED	0.00		
Cash Tips	0.00	Vac	0.00		SWT	90.50		
		Sick	0.00		SDI	0.00		
Subtotal	3282.93	Hol	0.00		SUI	0.00		
Dir Dep	-2786.94	Comm						
Taxes	-299.99	Misc						
Deducts	-196.00	Other						
Net Pay	0.00	<b>Gross Pay</b>		<b>3282.93</b>	<b>Total Tax</b>	<b>299.99</b>		

Year-to-Date: Gross 17093.63 Vacation: Earned 0.00 Direct Deposit [REDACTED] 2786.94

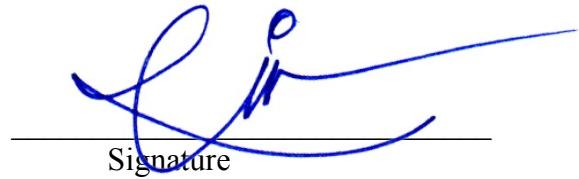
FWT 641.23 SWT 383.60

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Declaration of Translation

I, Carlos Radillo, declare that I am a certified Federal and State Court translator and I am fluent in both the English and Spanish languages. I have reviewed the attached Spanish Declarations of Felipe de Jesus Suarez Palafox and Felipe de Jesus Avila Soto and the English translations and I certify that the translations are true and correct.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on November 14, 2025.



A handwritten signature in blue ink, appearing to read "Carlos Radillo", is written over a horizontal line. Below the line, the word "Signature" is printed in a small, sans-serif font.

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA

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FELIPE DE JESUS AVILA-SOTO, et al. )  
Plaintiffs, ) Case No. 6:24-cv-01392  
v. ) JUDGE ROBERT R. SUMMERHAYS  
SOUTH CENTRAL SUGAR CANE )  
GROWERSí ASSOCIATION, INC., et al. ) MAGISTRATE JUDGE CAROL B.  
Defendants. ) WHITEHURST

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**DECLARACIÓN DE FELIPE DE JESÚS SUÁREZ-PALAFOX**

1. Mi nombre es Felipe de Jesús Suárez-Palafox. Soy uno de los demandantes en este caso.
2. Mi residencia permanente está en México. He trabajado para los demandados con una visa de trabajo temporal H-2A como conductor de camión durante cada temporada de cosecha de caña de azúcar entre 2022 y 2025. También trabajé en años anteriores como conductor de camion con visa H-2A para una empresa que también estaba asociada con la molina de Sterling Sugars.
3. Durante cada una de las temporadas de cosecha de caña de azúcar entre 2022 y 2025, trabajo para los demandados como camionero que opera un camión con remolque para transportar caña de azúcar desde los campos hasta el molino Sterling Sugars. No he tenido ninguna otra responsabilidad laboral con los Demandados aparte de trabajar como conductor de camión entre 2022 y 2025.
4. Entre 2022 y 2025, muchos de nosotros de México con visas H-2A hacemos el mismo trabajo que yo: conducir camiones para transportar caña de azúcar al molino. Yo y

muchos otros camioneros mexicanos nos alojamos en un viejo motel cerca de la molina y recogemos nuestros camiones cada día en el depósito de camiones.

5. Entre 2022 y 2025 trabajé más de 40 horas durante la mayoría de las semanas que trabajé para los demandados como camionero. Nunca he recibido ningún pago por horas extras cuando trabajé más de 40 horas en una semana, incluso durante la temporada actual de 2025.

Adjunto a esta declaración hay copias de algunos de los talones de cheque de pago que recibí que muestran que no recibí pago de horas extras cuando trabajé más de 40 horas a la semana, incluido uno de la temporada actual de 2025.

6. Mis compañeros de trabajo que vinieron de México con visas H-2A y también trabajaron como camioneros entre 2022 y 2025 tampoco recibieron pago de horas extras. Lo sé porque vivíamos juntos y a veces hablábamos de cómo nos pagaban.

Declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que lo anterior es verdadero y correcto a mi leal saber y entender.

Ejecutado el 5-NOV-2025

  
Felipe de Jesus Suarez Palafox